

GURBIR S. GREWAL

ATTORNEY GENERAL OF NEW JERSEY

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Attorney for Defendants, Gurbir S. Grewal, Jared M. Maples, New Jersey  
Office of Homeland Security and Preparedness, Camden County Prosecutor's  
Office, Jill S. Mayer, and Nevan Soumalis

By: Bryan Edward Lucas (ID: 108462015)

Deputy Attorney General

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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY  
TRENTON VICINAGE**

DAVID M. GRECO, individually and on  
behalf of others similarly situated,

Plaintiff,

v.

GURBIR S. GREWAL, New Jersey  
Attorney General; JARED M. MAPLES,  
Director, New Jersey Office of Homeland  
Security and Preparedness; NEW  
JERSEY OFFICE OF HOMELAND  
SECURITY AND PREPAREDNESS, a  
Cabinet Level Department of the State of  
New Jersey; CAMDEN COUNTY  
PROSECUTOR'S OFFICE, a municipal  
entity of the state of New Jersey; JILL S.  
MAYER, Acting Camden County  
Prosecutor; NEVAN SOUMILAS,  
Assistant Camden County Prosecutor;

Hon. Brian R. Martinotti, U.S.D.J.

Hon. Tonianne J. Bongiovanni, U.S.M.J.

Docket No. 3:19-cv-19145

**CIVIL ACTION**

**NOTICE OF MOTION  
TO DISMISS PURSUANT TO  
FED. R. CIV. P. 12(b)(1) AND (6)**

**(ELECTRONICALLY FILED)**

GLOUCESTER TOWNSHIP POLICE DEPARTMENT, a Municipal Entity of the State of New Jersey; BERNARD JOHN DOUGHERTY, Detective, Gloucester Township Police Department; NICHOLAS C. AUMENDO, Patrolman, Gloucester Township Police Department; DONALD B. GANSKY, Detective Sergeant, Gloucester Township Police Department; WILLIAM DANIEL RAPP, Detective, Gloucester Township Police Department; BRIAN ANTHONY TURCHI, Patrolman, Gloucester Township Police Department; "JOHN DOE #1" (a fictitious name); and "JOHN DOES 2-10" (fictitious names),

Defendants.

To: United States District Court  
District of NJ – Trenton Vicinage  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street  
Trenton, NJ 08608

Albert J. Rescinio, Esq.  
1500 Allaire Avenue, Suite 101  
Ocean, NJ 07712

Vincent P. Sarubbi , Esq.  
Daniel Joseph Defiglio, Esq.  
Archer & gGeiner  
One Centennial Square  
Haddonfield, NJ 08033

Howard L. Goldberg, Esq.  
First Assistant County Counsel  
Camden County Counsel's Office

Courthouse, 14th Floor  
530 Market Street  
Camden, New Jersey 08102-1375

**PLEASE TAKE NOTICE** that on **June 15, 2020**, or as soon thereafter as counsel may be heard, the undersigned attorney for the Defendants, Gurbir S. Grewal, Jared M. Maples, New Jersey Office of Homeland Security and Preparedness, Camden County Prosecutor's Office, Jill S. Mayer, and Nevan Soumalis, will move before the Honorable Brian R. Martinotti, U.S.D.J., for an Order dismissing all claims against these Defendants pursuant to Fed. R. Civ. P. 12(b)(1) and (6);

**PLEASE TAKE FURTHER NOTICE** that the undersigned shall rely upon the attached brief in support of the motion.

**PLEASE TAKE FURTHER NOTICE** that pursuant to Fed. R. Civ. P. 78, oral argument is not requested.

A proposed form of Order is attached.

GURBIR S. GREWAL  
ATTORNEY GENERAL OF NEW  
JERSEY

By: /s/ Bryan Edward Lucas  
Bryan Edward Lucas  
Deputy Attorney General

DATE: May 11, 2020